EDPS record of processing activity

Record of EDPS activities processing personal data, based on Article 31 of Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC.

Nr.	Item	Description
	Vaccination campaigns	
1.	Last update of this record	18/02/2021
2.	Reference number	51
3.	Name and contact details of controller	European Data Protection Supervisor (EDPS) Postal address: Rue Wiertz 60, B-1047 Brussels Office address: Rue Montoyer 30, B-1000 Brussels Telephone: +32 2 283 19 00 Email: edps@edps.europa.eu Responsible department: HRBA Unit: edpsgeco@edps.europa.eu Contact form for enquiries on processing of personal data to be preferably used: https://edps.europa.eu/node/759
4.	Name and contact details of DPO	dpo@edps.europa.eu
5.	Name and contact details of joint controller (where applicable)	

Nr.	Item	Description
6.	Name and contact details of processor (where applicable)	By virtue of the EDPS-EC SLA, the EC is the data processor.
		More specifically, the EC services in charge are: DG.HR.D.3, Working Conditions and the Medical Service.
		Contacts:
		HR-MEDICAL-SERVICE-VULNERABLE-VACCINATION@ec.europa.eu
		HR-BXL-HEALTH-VACCINATION@ec.europa.eu
7.	Short description and purpose of the processing	Personal data is processed within the framework of vaccination campaigns (seasonal flu and COVID-19) organised by the European Commission (EC) and covering also EDPS staff pursuant to the EDPS-EC Service Level Agreement (SLA).
		The seasonal flu vaccination programme is offered on a voluntary basis to patients who are particularly vulnerable to the flu (for example, because of their health condition, age or because they are pregnant).
		The EC runs an accredited vaccination centre for COVID-19 (active as of March 2021), organising a vaccination programme of EC and EDPS staff members on a voluntary basis according to the priorities established by the Belgian authorities (vulnerable, critical, other staff). Belgian authorities, namely the Interministerial Committee of Public Health -CMI- use the Vaccinnet platform (www.vaccinnet.be) for the management of the Vaccination Campaign. This platform is used at the Federal level for the registration and the management of COVID-19 vaccinations and for flagging possible secondary effects of the vaccines.
		The processing of personal data performed in relation with the vaccination campaign is carried out in order to:
		organise vaccination programme
		enable those who wish to be vaccinated to be vaccinated

Nr.	Item	Description
		monitor long-term adverse events
8.	Description of categories of persons whose data the EDPS processes and list of data categories	Staff members.
		Data provided by you:
		• identification data (first and last name, Belgian national number) - to the HRBA, which will be transmitted to the EC Medical Service and to Vaccinnet
		• data determining the possible presence of risks and/or contraindication, the presence of health problems, causes of vulnerability or other risk factors, and the possible occurrence of adverse effects - data collected by EC Medical Service before vaccination
		Data provided by the EC Medical Service and transmitted to Vaccinnet:
		the administration of the vaccine (decision, date, place of vaccination)
		• the characteristics of the vaccination (such as injection site, brand of vaccine product)
9.	Time limit for keeping the data	Personal data will only be kept for the time necessary to fulfil the purposes for which it is processed.
		The EDPS will keep the data for one month after transmission to the EC Medical Service.
		The EC Medical Service will include vaccination data in the medical record, which will be held for 40 years
		Flu vaccination consent forms: In accordance with the EC' data protection notice, flu vaccination consent forms are kept for 3 months after vaccination, unless side-effects are experienced, in which case they will be kept for a longer period.
10.	Recipients of the data	Access to your personal data in accordance with a strict need to know principle:
		• EDPS staff collecting data in order to inform the EC on staff members who would like to be vaccinated

Nr.	Item	Description
		Staff of the EC Medical Service organising the programme and staff of the federal
		Staff managing the Vaccinnet platform on behalf of CMI
11.	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	No such transfers are taking place
12.	General description of security measures, where possible.	Strict need to know priinciple to be applied.
		- Electronic file:
		Data are kept in the secured drive of the person responsible for the management of the procedure in the Human Resources Unit.
		- For the medical record : data are stored either in an encrypted and secured drive in a cupboard in a locked office to which only a restricted of the EC Medical Service colleagues have access on a need-to-know basis
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice:	Available internally